



Megan R. Brillault
15th Floor
477 Madison Avenue
New York, NY 10022-5802
Direct: (212) 702-5414
Fax: (212) 702-5450
mbrillault@bdlaw.com

March 1, 2012

VIA ECF

Hon. Andrew T. Baxter
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, New York 13261-7396

Re: *MPM Silicones, LLC v. Union Carbide Corporation,*
Civ. Action No. 11-cv-1542 (LEK)(ATB)

Dear Magistrate Judge Baxter:

We represent Defendant Union Carbide Corporation ("UCC") in the above-referenced action. On behalf of UCC, and with Plaintiff MPM Silicones, LLC's ("MPM") consent, I respectfully request a 45-day extension of UCC's deadline to file an answer or otherwise respond to Plaintiff's complaint, from March 2, 2012 to April 16, 2012. This unopposed request is made to provide counsel for UCC, which was only recently retained, sufficient opportunity to examine the factual allegations and claims in the complaint in order to file an appropriate response.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Megan Brillault", written over a horizontal line.

Megan R. Brillault
Bar Roll No. 511541

cc: Margaret J. Gillis, Esq., Counsel for Plaintiff MPM (via email)
Robert S. Sanoff, Esq., Counsel for Plaintiff MPM (via email)
Karl S. Bourdeau, Esq. (via email)
Harold L. Segall, Esq. (via email)